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April 17, 2018

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, DC 20554

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

Please find attached an *ex parte* letter dated March 15, 2018, which we intended to file in the record in this docket as of that date. We have since learned that the letter was not filed because of an error during the attempted submission into ECFS. An error message, rather than a confirmation message, was generated and received when the letter was submitted, though the error was not discovered until a later date. Nevertheless, we would like to properly file the March 15, 2018 letter, with the understanding that it will be filed as of the date of this letter. Please accept this submission and place these documents into the record in this docket.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in this docket.

Sincerely,

A handwritten signature in blue ink that reads "Colleen Thompson".

Colleen Thompson



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March 15, 2018

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, DC 20554

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

AT&T supports the federal regulatory relief for small cell equipment and their supporting structures (“small cell facilities”) proposed in the Draft Second Report and Order and, in particular, in the finding that those small cell facilities are not undertakings or major federal actions under the National Historic Preservation Act (“NHPA”) or National Environmental Policy Act (“NEPA”), respectively.¹ Minimally sized and streamlined small cell facilities are unlikely to adversely impact the environment or historic properties and, as such, should not be subject to unnecessary NHPA and NEPA processes.² AT&T has provided examples of different configurations of minimally sized and streamlined deployments in multiple cities. One example has generated criticism due to the lack of visual detail, namely exposed cables, number of radios, and equipment form factors, though the commenter still considered the antenna to be “of a modest size and of pleasing design.”³

For the sake of clarity, the picture of the site was taken around September 2017 when the site was used for small cell deployment testing, with frequent swapping, multiple configurations, and varied placement of equipment and wiring. The site was modified in December 2017 to make it operational. Now, the site has minimal visual clutter—fewer radios, equipment that is of similar color and with similar form factors that are vertically aligned on the pole, and appropriately-sized cables that are neatly bundled. Even so, this configuration is not typical, as it was designed to accommodate a local request to minimize pole change-outs where possible and was approved by that locality. As demonstrated in additional pictures below, other small cell deployments in the same locality are more of a stealth design. Carriers must be flexible in their small cell deployments to accommodate varied interests and requests by local governments and their small cell facilities that fit within the

¹ *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Second Report and Order, FCC-CIRC1803-01, WT Docket No. 17-79 (draft rel. Mar. 1, 2018).

² AT&T supports Verizon’s call for clarification that the deployment of facilities operating on 3.5 GHz GAA licenses are not federal undertakings or major federal actions because they will be small cell facilities within the size limits contemplated by the Draft Second Report and Order and require less Commission than geographic area licenses. See Letter from Andre J. Lachance, Associate General Counsel, Federal Regulatory and Legal Affairs, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 17-79 (filed Mar. 15, 2018).

³ Letter from Michael J. Marcus, Director, Marcus Spectrum Solutions, LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 17-79, at 1-3 (filed Feb. 27, 2018).

size limits contemplated in the Draft Second Report and Order should continue to benefit from the relief that Order proposes.



Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in this docket.

Sincerely,

Colleen Thompson

Colleen Thompson

CC:
Will Adams